

Jeffrey D. Hill v. New Castle County, et al.

C. A. No. 07-228 (GMS)

Plaintiff's Answering Brief In Opposition Of Defendants' Motion For Summary Judgment

APPENDIX J

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE

JEFFREY D. HILL,

Plaintiff,

v.

NEW CASTLE COUNTY POLICE

DEPARTMENT, a division of New

Castle County; and NEW CASTLE

COUNTY, a municipal corporation,

Defendants.

)
)
) Civil Action
) No. 07-228 (GMS)
)

Deposition of QUINTON L. WATSON
taken pursuant to notice at the New Castle County
Law Department, 87 Reads Way, New Castle,
Delaware, beginning at 2:08 p.m. on Monday, June
30, 2008, before Christina M. Vitale, Certified
Court Reporter and Notary Public.

APPEARANCES:

TIMOTHY J. WILSON, ESQUIRE

MARTIN & WILSON

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For the Plaintiff

MEGAN SANFRANCESCO, FIRST ASSISTANT COUNTY
ATTORNEY

New Castle County Law Department

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New Castle, Delaware 19720

For the Defendants

ALSO PRESENT: Jeffrey D. Hill and Mark Hitch

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1 QUINTON L. WATSON, the deponent
2 herein, having first been duly sworn on oath, was
3 examined and testified as follows:

4 BY MR. WILSON:

5 Q. Good afternoon, Captain Watson. Would
6 you like me to go through the instructions again?

7 A. Not really. I sat through them twice
8 already.

9 Q. We are going to start off the same way.
10 What did you do to prepare for today's
11 deposition?

12 A. I met with Megan Sanfrancesco.

13 Q. Anything else?

14 A. No.

15 Q. Did you review any documents?

16 A. I reviewed some Interrogatories that were
17 presented to me.

18 Q. Were those Interrogatories that we sent
19 to you?

20 A. I assume so, yes.

21 Q. Did you review Corporal Hill's deposition
22 transcript?

23 A. No.

24 Q. But you were here at his deposition,



1 correct?

2 A. No -- oh, yes, I was.

3 MS. SANFRANCISCO: To clarify for the
4 record I don't think he was here for the whole
5 deposition, were you?

6 THE WITNESS: Not for the whole
7 deposition.

8 MR. WILSON: Yeah, I think he was
9 here for part.

10 THE WITNESS: For the first half, I
11 believe.

12 BY MR. WILSON:

13 Q. Have you talked to anybody about this
14 lawsuit, not necessarily in preparation for the
15 deposition, but just in general?

16 A. Yes.

17 Q. Who have you talked to?

18 A. Captain Hitch. I think I talked to my
19 wife, Lieutenant McLaren. That's about it.

20 Q. And what did you and Captain Hitch talk
21 about?

22 A. Basically just talked about being
23 surprised that we were being sued in reference to
24 a personnel move.



1 Q. What about Lieutenant Colonel McLaren,
2 what did you guys talk about?

3 A. Same thing, I guess venting to him in
4 regards to defending the lawsuit, in regards to
5 personnel transfer.

6 Q. Did he ask you what the lawsuit was
7 about?

8 A. I just said that Jeff Hill lawsuit, but
9 he pretty much knew the substance of that I guess
10 from the grievance hearings.

11 Q. Did you talk to Sergeant Hyden about it?

12 A. Not about it per se, but the fact of the
13 matter is that I was included in the lawsuit
14 because initially I wasn't and then I was.

15 Q. And where were you born, sir?

16 A. Wilmington, Delaware.

17 Q. And what is your date of birth?

18 A. 12/5/63.

19 Q. Ever been arrested?

20 A. No.

21 Q. Serve in the military?

22 A. Yes.

23 Q. When did you serve in the military?

24 A. From 1982 until 1985.



1 Q. And what branch?

2 A. United States Marine Corps.

3 Q. And what was the final rank you achieved?

4 A. I actually got promoted to sergeant, but
5 I left as a corporal. I'll explain to you. I
6 took the test for sergeant. When they learned
7 that I wasn't going to reenlist they decided not
8 to give me the rank because they wanted to give
9 it to someone else. So, I left there as a
10 corporal.

11 Q. Did you go to college?

12 A. Yes.

13 Q. Where did you go?

14 A. Del Tech.

15 Q. And did you graduate?

16 A. No.

17 Q. What was your major?

18 A. Criminal justice.

19 Q. Are you still taking courses?

20 A. Off and on, yes.

21 Q. And your present job title is captain?

22 A. Yeah, captain of the patrol division.

23 Q. And how long have you held that title?

24 A. Since September 2nd of 2007.



1 Q. And just prior to that was that when you
2 were in charge of the mounted unit?

3 A. Yeah, part of that time I was a commander
4 of the criminal investigation unit and for a
5 portion of that time I had the mounted unit under
6 me.

7 Q. And once you assumed command of the
8 mounted unit or whatever it was called when you
9 were over the mounted unit did you learn about
10 this situation with Corporal Hill?

11 A. Yes.

12 Q. How did you learn about it?

13 A. I think Captain Hitch informed me of an
14 ongoing issue with Corporal Hill.

15 Q. Did he mention anything about Sergeant
16 Hyden?

17 A. Yeah, the fact of the matter is there was
18 some personnel issues between Sergeant Hyden and
19 Corporal Hill.

20 Q. By personnel issues do you mean
21 personality issues?

22 A. No. Just like performance-based issues,
23 Jeff not at times performing up to standards that
24 are set out for the mounted unit.



1 Q. What standards?

2 A. I guess teamwork, helping out,
3 statistical numbers, stuff like that.

4 Q. Are there statistical numbers that they
5 have to achieve?

6 A. No, but I guess what it is is she expects
7 a level of performance out of the officers. They
8 are a unit that when they're assigned different
9 assignments especially in high profile
10 communities it is almost like a zero tolerance
11 thing. They're put there for a specific reason.
12 They're not put there to warn people. They're
13 putt there because there is a problem. I guess
14 you would say your discretion is pretty much
15 limited as to just warning people, more so
16 enforcing traffic stuff, loitering, all kinds of
17 stuff, you know, whatever, zero tolerance.

18 Q. Is it within Sergeant Hyden's authority
19 to impose statistical measures on police
20 officers?

21 A. She is charged with the responsibility of
22 ensuring that the unit is producing and
23 performing up to standards. So, pretty much she
24 has more of a leeway because she is a sergeant in



1 charge of that unit. She doesn't pass any
2 statistical requirements on to us like this is
3 what my unit has to do. So, it's pretty much
4 left up to her.

5 Q. Did you participate in the decision to
6 transfer Corporal Hill?

7 A. Yes.

8 Q. And what was the reason for transferring
9 him?

10 A. There was a multitude of reasons. Some
11 of it was that his continued lack of performance
12 to a certain level. There were some issues with
13 him having respect for Sergeant Hyden's
14 authority. Just generally a lot of those issues
15 there.

16 Q. Did you ever consider Sergeant Hyden's
17 respect for Corporal Hill?

18 A. No.

19 Q. Are commanding officers such as sergeants
20 that are over a unit are they required to respect
21 officers underneath them?

22 A. Yes.

23 Q. Did you ever speak to Sergeant Hyden
24 regarding Corporal Hill's transfer?



1 A. Yes.

2 Q. And what did she say to you?

3 A. I had said to her that we were
4 contemplating moving Jeff out of the unit and I
5 just wanted to make her aware of that.

6 Q. How did she respond?

7 A. I don't recall exactly what she said, but
8 it was more so me doing the talking in reference
9 to us making a decision to move him out of the
10 unit. I think we started talking about other
11 members she would like possibly to bring back
12 into the unit.

13 Q. Did you get the indication she approved
14 of having Corporal Hill transferred out?

15 A. I don't know if you would say approved.
16 She gave no indication one way or the other if I
17 can say that. She didn't say, Well, why are you
18 doing that? Or, You shouldn't do that.

19 Q. Now, Captain Hitch testified that he was
20 unaware of the under the desk comment. Were you
21 aware of this comment?

22 A. Yes.

23 Q. Did you investigate this comment?

24 A. Yes.



1 Q. And what did you find?

2 A. I found from speaking to Sergeant Hyden
3 that she advised me after I mentioned to her
4 about the comment that she didn't recall making
5 that comment.

6 Q. Did she ever deny making it?

7 A. No. She used those words I don't recall
8 making that comment.

9 Q. Did you ever make a finding one way or
10 the other whether she made the comment?

11 A. No, because I was given specific
12 instructions in regards to looking into that.

13 Q. I'm not sure I understand.

14 A. If I can start by telling you how I got
15 involved with that.

16 Q. Okay.

17 A. Lieutenant Colonel McLaren who was the
18 acting chief at the time came into my office one
19 afternoon and I guess it was after a grievance
20 step hearing in the Hill case and he informed me
21 that apparently there was an issue that came up
22 during the grievance in regards to Jeff saying
23 that Nicole had made a comment about him going
24 under Captain Setting's desk. Lieutenant Colonel



1 then said that I need you to ask Nicole if she
2 remembers making that statement. I then said to
3 him, Okay, but what do you want me to do after
4 that? You want me to give you a memo form of
5 what her reply is? No, just let me know what she
6 said. I said okay.

7 She needed to sit down, I called her
8 over to the stables and I told her the reason why
9 I was calling and I asked her do you recall
10 making that statement to Jeff Hill? She at that
11 time told me, no, she didn't recall making that
12 statement. I said, Are you sure? Yes, I don't
13 recall making a statement like that. I then went
14 over and knocked on Lieutenant Colonel's door. I
15 said to him, I just got done talking to Nicole
16 and she doesn't recall making that statement. Do
17 you need me to do anything else? He said, No.
18 That was the end of my involvement at that point
19 in that whole issue.

20 Q. Did you have some subsequent involvement?

21 A. Yes.

22 Q. Can you tell me what that was?

23 A. About three weeks later I had just got
24 home from work and I got a phone call and it was



1 Sergeant Hyden. She told me she had a discussion
2 with Officers Brown and Guiton in regards to the
3 statement, the issue that I talked to her about a
4 few weeks ago. She says that she learned during
5 that conversation that Brown and Guiton did, in
6 fact, recall her making that statement to
7 Corporal Hill. She says, I still don't remember
8 making that statement, but I trust Brown and
9 Guiton and if they said I made it, I must have
10 made it, but I still don't recall it.

11 I said to her, Okay, Nicole, I'll
12 pass it on to Lieutenant Colonel tomorrow. Next
13 day I saw Lieutenant Colonel and let him know
14 about the conversation that I had with Sergeant
15 Hyden evening before and he said, Okay, and that
16 was the end of my involvement with that.

17 Q. Was Sergeant Hyden disciplined for making
18 the comment?

19 A. I don't believe so.

20 Q. Do you believe that a sergeant who makes
21 a comment like that should be disciplined?

22 A. I believe, yes, if it offends the
23 recipient, yes.

24 Q. Did you ever talk to Corporal Hill about



1 the comment?

2 A. No.

3 Q. So, you never found out if he was
4 offended by it?

5 A. No.

6 Q. Were you the person that decided to
7 replace Corporal Hill with Corporal Williams?

8 A. Yes.

9 Q. What did you base that decision on?

10 A. I based it on the fact that Rosemarie was
11 actually the last officer that came out of
12 mounted. So, I looked at that that she is
13 probably not that rusty. I know that Corporal
14 Berg had came out of there, but Corporal Berg
15 actually his position was a parks officer and
16 when he was a parks officer he had gotten cross
17 training in riding horses. So, technically he
18 wasn't a mounted officer in a sense full-time.
19 So, I was looking at someone that had been in
20 mounted full-time.

21 So, I know the discussion came up
22 when I was talking to Sergeant Hyden that she had
23 wanted Corporal Berg back in the unit and I kind
24 of didn't want to do that because I was more



1 concerned about how that would look to the rank
2 and file. What I mean by that is you have a guy
3 that just got transferred out of the parks unit,
4 he is already back on the street and now all of a
5 sudden you guys are going to slide him back into
6 the mounted unit. And that's just me, that was
7 my concern, I didn't want to leave that
8 appearance.

9 Q. I don't understand what the appearance
10 is.

11 A. The appearance is the fact that usually
12 when we bring somebody out of a unit we usually
13 post for that position. We usually post
14 department Y open for this position. In this
15 case we weren't posting for that position. We
16 were just putting someone in there temporarily.
17 I didn't want anybody thinking we were just going
18 to slide Berg in there without opening it to
19 everybody else. So, I just didn't want to go for
20 that.

21 I know Phil Davis' name came up. I
22 didn't want to go with his name. There was an
23 issue a while back way back with Phil Davis and a
24 horse. I just wanted to stay away from that. He



1 is a good officer, but I just wanted to stay away
2 from that. Ed Sommers' name came up. When I was
3 a risk manager with the department when I was
4 over top of HR I knew that Ed had a severe back
5 injury and it was almost to the point where it
6 was career ending-type of injury. He came back,
7 but I just didn't want to touch that because he
8 could probably get thrown off a horse, jumping up
9 -- hopping up and down on a horse, no, I said
10 let's not look at that issue.

11 So, I looked at Rosemarie. I
12 remember Rosemarie from when I was a lieutenant
13 on patrol squad C, she was an officer on that
14 squad. She always performed real good, never had
15 an issue with her, she always had that can-do
16 attitude. She just left the unit and I said,
17 Hey, why don't we put her back in there
18 temporarily?

19 I then went to the Lieutenant Colonel
20 with my recommendation. He had no issue with it,
21 but he said to me make sure she understands this
22 is a temporary position, just fill it for the
23 summer so we can get through the summer. In the
24 fall we are going to post it department-wide and



1 bring somebody else in.

2 I called Corporal Williams and spoke
3 to her about an addition. I didn't say it was a
4 vacancy, I said addition because I didn't want
5 her to know that. I said it's an addition. We
6 are thinking about beefing up mounted for the
7 summer. Would you be interested in coming back
8 on a temporary basis? She said, I would love to
9 come back. I said, You understand now that the
10 end of the summer you are going to go back to
11 your patrol squad. We are just going to fill it
12 for right now. She said, I don't have any
13 problem with that.

14 I went back and told the Lieutenant
15 Colonel and said I did go over and made sure she
16 understood it was only temporary and that we were
17 posting it in September and he said okay and so
18 we did.

19 Q. Was the job eventually posted?

20 A. No.

21 Q. Why not?

22 A. In the interim before the end of the
23 summer we formed what is called a special
24 operations division and that was taking different



1 entities from the building and putting them under
2 one command. The commander at that time was
3 Captain Setting so mounted was taken from me and
4 put under his command. I explained to Captain
5 Setting that we had Rosemarie in there for the
6 summer and told her she would be coming out in
7 the fall. He said, Okay, okay, no problem. I
8 left it at that. The fall came around and she
9 didn't come out at all.

10 Q. That wasn't your decision?

11 A. That wasn't my decision.

12 Q. Corporal Williams had just come out of
13 mounted I think you said?

14 A. Yeah, and what I meant by that just come
15 out being the one that I remember recently coming
16 out the shortest period of time and I think I
17 want to say probably in about two years she had
18 been out.

19 Q. Why did she leave the mounted unit?

20 A. I believe at the time it was just they
21 were rotating people. Sometimes they do that
22 when they want to bring in new people and rotate
23 some older people out of the unit so they will do
24 that from time to time, but I wasn't there when



1 they rotated her out so I don't know exactly the
2 reason why.

3 Q. And she was rotated into patrol?

4 A. Yes.

5 Q. The same division Corporal Hill was put
6 into?

7 A. Yes, yes. Actually, the same squad.

8 Q. When you made the decision to transfer
9 Corporal Hill, did you ever consider that
10 Sergeant Hyden might be part of the problem?

11 A. No.

12 Q. Why not?

13 A. I had gotten no indication at all that
14 she was part of the problem. From my standpoint
15 as being her supervisor she had been running the
16 unit effectively. I had no issues with her
17 knowledge of horses, the needs, and also her
18 ability to supervise the officers there. So,
19 like I said, my door is open one way or the other
20 and if anybody had any issues they could come to
21 me. There was never an issue with that. No one
22 came to me and told me any complaints about
23 Sergeant Hyden.

24 Q. You knew Corporal Hill had made



1 complaints about Sergeant Hyden, right?

2 A. In the past with other commanders or
3 whatever, but not with me.

4 Q. That did not raise any red flags to you
5 that they had problems before and now all of a
6 sudden she is coming to you with problems between
7 Corporal Hill again?

8 A. No, because my issue with that is that
9 if, in fact, the sergeant did what she was
10 supposed to do and if the officer had any issues
11 they could come to me also. It's not one of
12 those things where you don't come to me and
13 especially in our chain of command if you are
14 having problems with your immediate supervisor
15 you are allowed to go around that supervisor to
16 the next supervisor above them. Corporal Hill
17 never came to me with any issues about Sergeant
18 Hyden at all.

19 Q. Were you aware of the clean slate
20 meeting?

21 A. I was aware of a meeting held between
22 Sergeant Hyden and Captain Hitch and Jeff Hill,
23 but I don't know if they characterized it to me
24 as a clean slate.



1 Q. Did you have an understanding that the
2 parties were going to start new from that point
3 forward?

4 A. Yes.

5 Q. And it didn't raise any red flags with
6 you that about a month later Sergeant Hyden is
7 complaining again?

8 MS. SANFRANCESCO: Objection.

9 A. No, it didn't raise any red flags for me.
10 Just the fact that obviously it's not starting
11 off again the right way.

12 Q. Did you ever consider that maybe Corporal
13 Hill didn't complain because he thought it wasn't
14 a clean slate?

15 A. No, never thought that.

16 Q. How long were you in charge -- I keep
17 saying the mounted unit, I know you were in
18 charge of other things, but when the mounted unit
19 was under you?

20 A. I came back into -- I took over the
21 criminal investigation unit I think it was in
22 February of '06. At that time I think I took the
23 mounted then from Captain Hitch because he had it
24 and, I don't know, somewhere probably before the



1 end of that summer it was moved into special
2 operations I believe. Maybe it went around to
3 the following year and then it was taken from me
4 -- I mean, removed from my command. I don't want
5 to use a negative word, taken from me.

6 Q. In our complaint we state that when you
7 and Captain Hitch called Corporal Hill in to
8 inform him of the transfer that he was not given
9 a reason for the transfer and that statement was
10 denied. Did you give him a reason that he was
11 being transferred?

12 A. Absolutely.

13 Q. What did you tell him?

14 A. We told him it was based on performance
15 issues and we also talked about him not -- and I
16 know I specifically talked to him about not
17 respecting the authority of Sergeant Hyden and I
18 just couldn't, me personally, I couldn't tolerate
19 that.

20 Q. Did you identify what the performance
21 issues were?

22 A. They had been outlined before. Like I
23 said, myself and Captain Hitch were talking to
24 him and it was good both of us were in there



1 because it kept a kind of continuity to some of
2 the issues. So, some of his performance around
3 the stables, his reports and stuff like that, all
4 that kind of activities.

5 My focus pretty much was on the fact
6 that he still in my opinion was not submitting to
7 the rank above him and what that is is Sergeant
8 Hyden's rank and pretty much for me is when the
9 supervisor tells you to do something or tasks you
10 with something, if is not illegal, unethical or
11 immoral, you are supposed to do. If you don't do
12 it, you not only have an issue with her, but you
13 have an issue with me because she was in charge
14 of that unit and she works under me so,
15 therefore, it's an issue. So, I can't stand for
16 that in any of the units that I have ever run.

17 Q. Do you have specific examples of things
18 she asked him to do?

19 A. I'll give you two examples. One of them
20 was the anniversary -- I think it was the mounted
21 unit's 25th anniversary. I think Jeff was tasked
22 with the assignment of a challenge coin, they
23 wanted to get a challenge coin made for this
24 event, and I guess they wanted to hand it out to



1 some different people or whatever and he was
2 given some instructions on a vendor to use for
3 this.

4 I heard from her a few times where it
5 seemed like Jeff was dragging his feet a little
6 bit with the process and then he actually went on
7 and got in contact with another vendor, which is
8 not what Sergeant Hyden had instructed him to do.
9 Again, just seemed like he was off trying to do
10 his own thing and not listening to what the
11 supervisor told him to do.

12 Another issue, again, showing his
13 lack of respect for authority was an issue I
14 remember when she called me and was asking had I
15 seen Jeff? I said to her, I said, I just saw
16 Jeff about ten minutes ago in the copy room with
17 Lieutenant Schreiber, they were talking when I
18 walked past there. She then said, Oh, really?
19 He is supposed to be at the stables here helping
20 tack up the horses for the day's assignment.

21 Again, that's another issue and the
22 stables are probably around ten, eleven miles
23 away from our main headquarters. For you to
24 actually leave the stables and come across town



1 I'm thinking if it's during the daytime I think
2 you might want to let the sergeant know if they
3 think you are outside and not gone all the way
4 across town. Why is that? I don't know. You
5 ask your client. I'm thinking that you must have
6 no disregard for your supervisor and just going
7 to do what you want to do. I can't have that.

8 Q. Did you ask him why he wasn't at the
9 stables?

10 A. I didn't need to. I left it to Nicole.
11 I told Nicole that I just saw him ten minutes
12 ago. He is not there now obviously because I
13 just came back down the hall and I didn't see
14 him. So, I'm assuming she addressed the issue
15 with him once I told her I saw him at the
16 building.

17 Q. At this meeting when you were informing
18 him of the transfer did he ask you if this had
19 anything to do with the complaint that he made
20 against Sergeant Hyden?

21 A. Yes.

22 Q. And what was your response?

23 A. I told him no on two occasions on that
24 meeting because he brought it up twice in that



1 meeting and both times I told him it was not and
2 I know that Captain Hitch also said the same
3 thing because we were in the meeting together. I
4 think his whole reply is this is so wrong on so
5 many levels.

6 Q. With that statement did you believe that
7 he thought that it was because he made the
8 complaint?

9 A. I'm assuming because I had to say it to
10 him twice in there that it wasn't. So, I'm
11 assuming he may have thought it was.

12 MR. WILSON: Again, let me talk to
13 Jeff and we should be able to wind it up well
14 before five o'clock.

15 (Brief recess.)

16 BY MR. WILSON:

17 Q. The issue with the coin, Corporal Hill
18 completed that task, correct?

19 A. Yes.

20 Q. Are you aware that Corporal Hill spoke to
21 Sergeant Hyden about using a local vendor and she
22 approved it?

23 A. No.

24 Q. If a police officer ignores an order from



1 a superior, is that something that warrants
2 discipline?

3 A. Are you talking about a direct order or
4 instructions? What are you talking about?

5 Q. Tell me what the difference is.

6 A. Well, usually if you are given an order
7 it's me telling you directly that I want you to
8 do something, but, if I ask you to do something,
9 that's a little different, it's not as strong;
10 but, if I ask you to do something and you don't
11 do it and then I come back to you and say I'm
12 ordering you now to do it, see what I'm saying,
13 now it has gotten a little more serious and more
14 official. That's the difference. It would all
15 depend on what it was.

16 Q. The vendor thing did you view that as an
17 order or an instruction?

18 A. I viewed it as an instruction. Everybody
19 was given tasks so I viewed it as her giving him
20 instructions on how she wanted the whole coin
21 thing to go.

22 Q. The issue with Jeff not being where he
23 was supposed to do don't all police officers
24 carry cell phones?



1 A. No. Some do, some don't.

2 Q. Do you know if Corporal Hill carried a
3 cell phone?

4 A. I don't have that personal knowledge. It
5 wasn't anything the department assigned to him.
6 So, if it is, it's a personal.

7 Q. Did Sergeant Hyden state why she was
8 calling you to look for Corporal Hill?

9 A. She was asking me if I seen him. I don't
10 know if she thought possibly he may have been at
11 the building, but she was calling me to ask have
12 I seen him around.

13 Q. Did she ever call you looking for any of
14 the other people that worked for her?

15 A. Not that I recall.

16 Q. So, it was just this one time?

17 A. Right.

18 Q. By virtue of him not being at the stables
19 how did you view that as his disobeying an order
20 or an instruction?

21 A. I view it this way. During the workday
22 the supervisor of a specific unit or squad is
23 charged with the accountability of an employee.
24 If I come to you and I ask you where Jeff is you



1 should be able to tell me where he is at. If he
2 is in court that day, he is on vacation that day,
3 if he is down in a development working, you
4 should know. You shouldn't throw your hands up
5 and say I don't know because then I'm having an
6 issue with you. He works for you and you don't
7 know where he is at.

8 So, accountability is important not
9 only in the mounted unit, but everywhere. If
10 anybody came to me and asked me where is so and
11 so I should be able to tell them where so and so
12 is. Off-duty that's different, but on-duty,
13 yeah.

14 Q. Did it strike you as odd that she was
15 calling you looking for Corporal Hill?

16 A. No. I just took it as maybe seeing if he
17 was over the building and if I had seen him.
18 That's what I took it as.

19 Q. Why wasn't Corporal Hill disciplined
20 somehow instead of transferring?

21 A. Why wasn't he disciplined instead of
22 transferring him?

23 Q. Yes.

24 A. That's just not the method I would have



1 suggested or even brought up. My thing is in
2 essence is that he is in a specialized unit.
3 There is a lot required with anybody in a
4 specialized unit. Our thing is to make sure we
5 have a cohesive group that works as a team. If
6 that's not working out, maybe look at maybe
7 making some changes. We don't look at right away
8 going in and disciplining him. We look at making
9 some changes.

10 Maybe he is not the right fit in
11 there, maybe some things have changed, maybe we
12 need to get some fresh people in here and send
13 this officer back to the street. So, never
14 crossed my mind to discipline him. It just means
15 obviously we may need to make a change here.

16 Q. Did you know how long Corporal Hill had
17 worked in the mounted unit?

18 A. No.

19 Q. Did you look in to see if there had been
20 any other past issues with regard to his
21 performance?

22 A. No, other than what I've heard from
23 Captain Hitch and the investigation and memos and
24 all that kind of stuff, yeah, that's about it.



1 Q. With regard to the under the desk comment
2 were you instructed to investigate that?

3 A. I was instructed by Lieutenant Colonel
4 McLaren to ask Sergeant Hyden whether she made
5 the comment or not.

6 Q. So, you weren't instructed to investigate
7 it, just ask her about it?

8 A. Yes.

9 MS. SANFRANCISCO: I object.

10 A. I did exactly what I was instructed to do
11 and that was to ask her if she made the comment
12 or not.

13 Q. Did you think that an issue like that
14 warranted any further investigation?

15 A. Honestly I don't know. I mean, it's one
16 of those things if it had just happened then
17 obviously a whole different realm of things would
18 have happened. You would do your proper
19 investigation and all that. If it came up in a
20 grievance possibly a year, year and a half after
21 it was allegedly happened and my boss just told
22 me to ask her, I did exactly what my boss told
23 me, asked her.

24 Q. Because of the passage of time it was not



1 as serious as it would have been if it had been
2 reported to you right away?

3 A. Just my opinion, you are asking me my
4 opinion?

5 Q. Yes, sir.

6 A. Yes, because if that statement offended
7 you right then and there when it happened it
8 would have brought it up. A year and a half
9 later, two years later, I don't know if it
10 offended you that much at that point to bring it
11 up and especially in a grievance hearing. So,
12 when you ask me to ask Sergeant Hyden I did
13 exactly what he asked of me and I asked her.

14 MR. WILSON: That's it.

15 MS. SANFRANCESCO: No questions.

16 (The deposition was concluded at 2:51
17 p.m.)

18 I N D E X

19 DEPONENT: Quinton L. Watson PAGE

20 Examination by Mr. Wilson 2

21 E X H I B I T S

22 (No exhibits marked for identification.)

23 ERRATA SHEET/DEPONENT'S SIGNATURE PAGE 31

24 CERTIFICATE OF REPORTER PAGE 32

